



{In Archive} Re: UIC Program Question 
Philip Dellinger to: Ray Leissner

11/06/2009 01:49 PM

From: Philip Dellinger/R6/USEPA/US
To: Ray Leissner/R6/USEPA/US@EPA
Archive: This message is being viewed in an archive.

Thanks Ray. Good response.
UIC Program Question



UIC Program Question

Ray Leissner to: smreed7

11/06/2009 01:42 PM

Cc: Philip Dellinger, Robert-Eu Smith

Mr. Reed,

I am with EPA's underground injection control program (UIC) in Dallas and was asked by Mr. Robert Smith, EPA HQ, to respond to your email below. The federal UIC program does not have requirements on allowable distance between an injection well and a public drinking water well. Such rules are commonly referred to as set-back rules and are usually administered at the state level. The state agency in Texas that would administer set back rules for injection wells would be the Railroad Commission of Texas (RRC). The RRC maintains a district office in Kilgore, Texas, (903)983-3413.

As for agencies responsible for sampling BTEX, THC, etc., the regulating agency for the activity suspected of causing the alleged contamination is usually the agency to test for contamination. Testing is expensive and decisions to test for contaminants often hinge upon whether the evidence warrants the expenditure. As the concern in your email points to a potential contamination of a public water supply well, the operating public water supply system is likely to be the first entity to detect the introduction of a contaminant. They in turn would contact the RRC should the contaminant lead them to believe it is oil field related in origin.

I hope you find this information useful.

Ray Leissner, Env. Eng.
Ground Water / UIC Section (6WQ-SG)
(214) 665 - 7183
USEPA, Region 6

Dear Mr. Smith,

I am working with a group of citizens in east Texas who are concerned with negative environmental consequences. The injection site will be only 745 feet from the community's public drinking water well.

The EPA, OIG and Texas Railroad Commission have failed to enforce laws in the community in the past with respect to the regulations concerning the close proximity between the SWD operation and the public water supply. In addition, have you ever been asked to provide information regarding the SWD operation individually for BTEX and THC? Any direction you could provide in answering these questions would be greatly appreciated.

Matthew Reed